

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES DEPARTMENT
OF HOMELAND SECURITY,
IMMIGRATION AND CUSTOMS
ENFORCEMENT,

Plaintiff,

V.

BADRIYAH AWAD A ALASMARI,

Defendant.

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CIVIL NO. 4:25-cv-3079

COMPLAINT

Plaintiff, United States Department of Homeland Security, Immigration and Customs Enforcement (“ICE”), files this Complaint seeking an Emergency Court Order to permit involuntary hydration and medical testing of Defendant Badriyah Awad A Alasmari, an alien lawfully in detention at the Houston Contract Detention Center. Ms. Alasmari was classified as a hunger striker on May 31, 2025, and is now on day 31 of her hunger strike. Her refusal to eat and drink has reached a point where serious bodily injury is likely.

JURISDICTION

1. This Court has jurisdiction pursuant to 28 U.S.C. § 1345 because the United States of America is the Plaintiff.

2. Courts have recognized that the United States has authority to prevent suicides by detainees and prisoners. *See Aamer v. Obama*, Nos. 13–5223, 13–5276, 13–5224, 13–5225, 2014 WL 519238 (D.C. Cir. Feb. 11, 2014) (acknowledging that absent exceptional circumstances prison officials may force-feed a starving inmate actually facing the risk of

death); *In re Soliman*, 134 F.Supp.2d 1238 (N.D. Ala. 2001) (noting that the Government's interests in the preservation of life and other factors have provided a basis for ordering forced feeding of an immigration detainee); *In re Sanchez*, 577 F.Supp. 7 (S.D.N.Y. 1983) (the Government was permitted to force-feed civil contemnor who had gone on hunger strike and was in immediate danger of suffering permanent bodily damage as a result); *DHS v. Tortolo-Garcia*, No. 4:24-CV-02268, ECF No. 5 (S.D. Tex. June 18, 2024) (granting temporary restraining order to allow for involuntary medical monitoring, involuntary feeding, and hydration)(Ellison, J.); *DHS v. Ali*, No. 4:24-CV-02242, ECF No. 5 (S.D. Tex. June 14, 2024) (same) (Hanan, J.).

VENUE

3. Venue is proper pursuant to 28 U.S.C. § 1391(b)(2) because a substantial part of the events giving rise to the claim occurred in this district, at the Houston Contract Detention Facility, in Houston, Texas.

FACTS

4. Defendant is an individual in ICE custody.

5. Defendant is a citizen and national of Saudi Arabia. She has been detained at the HCDF since June 25, 2025. Prior to that, she was detained at the Richwood Correctional Facility in Monroe, LA, from May 05, 2025, to June 25, 2025.

6. Defendant officially began her hunger strike on May 31, 2025, before being transferred to HCDF for higher level medical care. On May 31, 2025, as of dinner, Ms. Alasmari missed her ninth consecutive meal and was classified as a hunger striker pursuant to the IHSC Hunger Strike Directive 03-04, ERO Directive 11758. Ms. Alasmari states that she

is on a hunger strike because she wants to be released from ICE custody. She is on day 31 of her official hunger strike and has missed 95 consecutive meals as of breakfast on July 2, 2025.

7. Defendant's treating physician at Houston Contract Detention Facility is concerned that involuntary hydration is necessary now to prevent further deterioration and serious medical complications. Continued fasting will result in permanent damage to her internal organs and has the potential to become life threatening. Metabolic imbalance, if left untreated, will cause fatal arrhythmia and/or cardiac arrest.

8. If Defendant's medical condition worsens, Plaintiff may need to seek additional emergency relief from this Court.

PRAYER FOR RELIEF

WHEREFORE, Petitioner prays:

- a. That the Court issue an Order directing the United States, through competent medical providers employed by or contracted with the Public Health Service, ICE Health Service Corps, or at private medical facilities to: (1) involuntarily hydrate and/or provide nutrition to Defendant; (2) perform physical evaluations on Defendant, take her vital signs, and perform laboratory testing; and (3) restrain Defendant, if necessary, to accomplish these procedures.
- b. That the Court set this matter for hearing as soon as practicable so that it can determine the rights of Defendant; and
- c. For other such relief as the Court deems appropriate.

Dated: June 30, 2025

Respectfully submitted,

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